Filed 02/01/2008

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA

MARTHA ADAMS, et al.,

* *

Plaintiffs,

CIVIL ACTION NO.: v. 2:07-cv-01064-WKW-TFM

ALBANY INTERNATIONAL, et al.,

Defendants.

*

MOTION TO DISMISS, OR IN THE ALTERNATIVE, MOTION TO SEVER AND FOR MORE DEFINITE STATEMENT

COMES NOW Defendant, GOULDS PUMPS, INC., and moves this Honorable Court to dismiss Plaintiffs' Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim upon which relief may be granted in that it fails to comply with Rule 8 of the Federal Rules of Civil Procedure. Defendant further moves to dismiss the claims of certain Plaintiffs for failure to comply with Alabama's statute of limitations. In the alternative, Defendant moves for an order severing the claims of the Plaintiffs under FRCP 20 and for an Order requiring Plaintiffs to provide a more definite statement of their claims under FRCP 12(e).

WHEREFORE, Defendant, GOULDS PUMPS, INC., prays that its Motion be granted and for such other and further relief this Honorable Court deems necessary and proper.

Respectfully submitted,

/s/ F. Grey Redditt, Jr.

F. GREY REDDITT, JR. (ASB-5142-R64F) TIMOTHY A. CLARKE (ASB-1440-R67T)

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CERTIFICATE OF SERVICE

I hereby certify that on February 1, 2008, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to counsel who are CM/ECF participants.

> /s/ F. Grey Redditt, Jr. F. GREY REDDITT, JR.